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Counsel for the Class Representatives of (1) Int'l Union, UAW, et. al. v. General Motors Corp., Civil Action No. 07-14074 (E.D. Mich.) and (2) UAW et. al. v. General Motors Corp., No. 05-CV-73991 (E.D. Mich.)

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

General Motors Corporation, *et al.*

Case No. 09-50026 (REG)

Debtors.

(Jointly Administered)

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MOTION FOR ADMISSION TO PRACTICE, *PRO HAC VICE*

1. I, William T. Payne, a member in good standing of the bar in the States of California and Pennsylvania, the United States Supreme Court, the United States Courts of Appeals for the First, Third, Fourth, Sixth, Seventh, Eighth, Ninth, Tenth, Eleventh, and D.C. Circuits and the United States District Courts for the Eastern District of California, Northern District of California, Central District of California, Northern District of Illinois, Eastern District of Michigan, Western District of Pennsylvania, Northern District of Ohio, Southern District of Ohio and Western District of Tennessee, request admission, *pro hac vice*, before this

Court, to represent the Class Representatives of (1) Int'l Union, UAW, et. al. v. General Motors Corp., Civil Action No. 07-14074 (E.D. Mich.) and (2) UAW et. al. v. General Motors Corp., No. 05-CV-73991 (E.D. Mich.) (the "Class") in the above-referenced, jointly-administered, Chapter 11 cases and any and all adversary proceedings and contested matters in which the Class is or may become a party, pursuant to Rule 2090-1(b) of the Local Bankruptcy Rules for the Southern District of New York.

2. My address is: Stember Feinstein Doyle & Payne, LLC, 429 Forbes Avenue, Allegheny Building, 17th Floor, Pittsburgh, PA 15219.

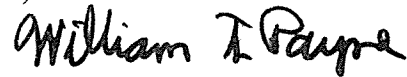
3. My telephone number is (412) 281-8400.

4. My e-mail address is wpayne@stemberfeinstein.com.

5. I agree to pay the fee of \$25 upon entry of an order admitting me to practice *pro hac vice*.

Dated: June 3, 2009

**STEMBER FEINSTEIN DOYLE
& PAYNE, LLC**



By: _____

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